```
CARLA A. McCAULEY (State Bar No. 223910
      carlamccauley@dwt.com
    DAVIS WRIGHT TREMAINE LLP
    865 South Figueroa Street, 24th Floor
    Los Angeles, California 90017-2566
3
    Tel.: (213) 633-6800 Fax: (213) 633-6899
4
    ROBERT D. BALIN (pro hac vice pending)
      bobbalin@dwt.com
5
    LACY H. KOONCE, III (pro hac vice pending)
      lancekoonce@dwt.com
6
    SAMUEL BAYARD (pro hac vice pending)
      samuelbayard@dwt.com
 7
    GEORGE WUKOSON (pro hac vice pending)
      georgewukoson@dwt.com
8
    DAVIS WRIGHT TREMAINE LLP
    1633 Broadway
9
    New York, New York 10019
Tel.: (212) 489-8230 Fax: (212) 489-8340
10
    ATTORNEYS FOR PLAINTIFFS
11
                      UNITED STATES DISTRICT COURT
                     CENTRAL DISTRICT OF CALIFORNIA
12
    CHINA CENTRAL TELEVISION, a China
                                            ) Case No.
    company; CHINA INTERNATIONAL
                                             CV15-01869 MMM (AJWx)
13
    COMMUNICATIONS CO., LTD., a China company; TVB HOLDINGS (USA), INC., a
                                             COMPENDIUM OF EVIDENCE
14
                                             IN SUPPORT OF PLAINTIFFS'
    California corporation; and DISH
                                             MOTION FOR PRELIMINARY
    NETWORK L.L.C., a Colorado limited
15
                                             INJUNCTION, VOLUME 7 OF 7
    liability company,
                       Plaintiffs,
16
                                            [Notice of Motion and Motion for
         VS.
                                            Preliminary Injunction and
17
    CREATE NEW TECHNOLOGY (HK)
                                            Proposed Order filed concurrently
    LIMITED, a Hong Kong company; HÚA
18
    YANG INTERNĂTIONAL TECHNOLOGY
                                            Date:
                                                       June 8, 2015
    LIMITED, a Hong Kong company;
                                                       10:00 a.m.
                                            Time:
19
    SHENZHEN GRĔATVĬSION NÉTWORK
    TECHNOLOGY CO. LTD., a China
                                            Crtrm.:
                                                       780
20
   company; CLUB TVPAD, INC., a California
    corporation; BENNETT WONG, an
                                            Action Filed March 13, 2015
21
    individual; ASHA MEDIA GROUP INC.
    d/b/a TVPAD.COM, a Florida corporation;
22
    AMIT BHALLA, an individual;
    NEWTVPAD LTD. COMPANY d/b/a
23
    NEWTVPAD.COM a/k/a TVPAD USA, a
    Texas corporation; LIANGZHONG ZHOU,
24
    an individual; HONGHUI CHEN d/b/a E-
    DIGITAL, an individual; JOHN DOE 1 d/b/a
25
    BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
    DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
26
    JOHN DOE 5 d/b/a GANG YUE; JOHN
    DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
27
    d/b/a GANG TAI WU XIA; and JOHN DOES
    8-10,
28
                       Defendants.
```

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 2 of 95 Page ID #:1728

1	INDEX	
2	VOLUME 7	
3	EXHIBIT 96	
4	EXHIBIT 97	
5	EXHIBIT 98	
6	EXHIBIT 99	
7	EXHIBIT 100	
8	EXHIBIT 101	
9	EXHIBIT 102	
10	EXHIBIT 103	
11	EXHIBIT 104	
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

----Original Message-----

From: trackingupdates@fedex.com [mailto:trackingupdates@fedex.com]

Sent: Monday, November 24, 2014 4:00 PM

To: Kuelling, Chris

Subject: FedEx Shipment 559753481530 Delivered

This tracking update has been requested by:

Company Name: DISH NETWORK / ECHOSTAR

Name: SCOTT FOSTER

E-mail: CHRIS.KUELLING@DISH.COM

Message: CLUB TV PAD INC

Our records indicate that the following shipment has been delivered:

Reference: 3653601600678050 /C.KUELLING

Ship (P/U) date: Nov 21, 2014

Delivery date: Nov 24, 2014 2:58 PM Sign for by: Signature not required Delivery location: HAYWARD, CA

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 5 of 95 Page ID

Delivered to: Residence

Service type: FedEx Express Saver Packaging type: FedEx Envelope

Number of pieces: 1 Weight: 0.50 lb.

Special handling/Services: Deliver Weekday

Residential Delivery

Tracking number: 559753481530

Shipper Information Recipient Information SCOTT FOSTER CLUB TV PAD INC

DISH NETWORK / ECHOSTAR CLUB TV PAD INC 9601 SOUTH MERIDIAN BLVD 3240 SHAWN WAY

ENGLEWOOD HAYWARD

CO CA US US 80112 94541

Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 4:59 PM CST on 11/24/2014.

To learn more about FedEx Express, please visit our website at fedex.com.

All weights are estimated.

To track the status of this shipment online, please use the following:

 $\underline{https://www.fedex.com/insight/findit/nrp.jsp?tracknumbers=559753481530\&language=en\&opco=FX\&clientype=ivpodalltt}$

This tracking update has been sent to you by FedEx on the behalf of the Requestor noted above. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and fedex.com's terms of use, go to fedex.com.

Thank you for your business.

From: <u>trackingupdates@fedex.com</u> [<u>mailto:trackingupdates@fedex.com</u>]

Sent: Wednesday, November 26, 2014 7:48 AM

To: Bailey, Rosalyn

Subject: FedEx Shipment 534974367371 Delivered

Delivered

5900

32043 US

GREEN COVE SPRINGS, FL

Your package has been delivered

Tracking # 534974367371

Ship (P/U) date:
Monday, 11/24/14
SCOTT FOSTER
DISH NETWORK
Englewood, CO 80112
US

Manage | Learn | Office/Print Services

Delivery date:
Wednesday, 11/26/14
9:43 AM
ASHA MEDIA / TVPAD.COM
411 WALNUT STREET SUITE

Personalized Message

PLEASE WRITE YOUR DISH E-MAIL CORRECTLY IF YOU ARE REQUESTING FOR TRACKING NUMBERS. THANK YOU.

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:	534974367371	
Status:	Delivered: 11/26/2014 09:43 AM Signed for By: K.WALKER	
Reference:	3653601600678050 / CHRIS KUELL	
Signed for by:	K.WALKER	
Delivery location:	GREEN COVE SPRINGS, FL	
Delivered to:	Receptionist/Front Desk	
Service type:	FedEx Express Saver	
Packaging type:	FedEx Envelope	
Number of pieces:	1	
Weight:	0.50 lb.	
Special handling/Services:	Deliver Weekday	

This tracking update has been requested by:

Company name: DISH NETWORK

Name: SCOTT FOSTER

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 8 of 95 Page ID #:1734

	#.1754			
Email:	KATHRYN.ANGELLO@DISH.COM			
Please do not re approximately 8:48 AM	spond to this message. This email was sent from an unattended mailbox. This report was generated at M CST on 11/26/2014.			
To learn more about F	o learn more about FedEx Express, please go to fedex.com.			
All weights are estimate	ted.			
To track the latest stat	rus of your shipment, click on the tracking number above, or go to <u>fedex.com</u> .			
authenticity of the requ	has been sent to you by FedEx on the behalf of the Requestor noted above. FedEx does not validate the duestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's racy of this tracking update. For tracking results and terms of use, go to fedex.com fedex.com.			
Thank you for your bus	siness.			

----Original Message-----From: Tucker, Daniel

Sent: Monday, November 24, 2014 7:32 AM

To: Kuelling, Chris Cc: Cate, Christian

Subject: FW: FedEx Delivery Exception

FYI

Thank you,
Dan Tucker
DISH-Shipping & Receiving
9601 S. Meridian Blvd
Englewood, CO, 80112
O.303-723-3349
C.720-315-5829
mailto:Daniel.tucker@dish.com

----Original Message-----

From: trackingupdates@fedex.com [mailto:trackingupdates@fedex.com]

Sent: Sunday, November 23, 2014 7:51 PM

To: Tucker, Daniel

Subject: FedEx Delivery Exception

This tracking update has been requested by:

Company Name: DISH NETWORK / ECHOSTAR

Name: SCOTT FOSTER

E-mail: CHRIS.KUELLING@DISH.COM

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 12 of 95 Page ID

#:1738

Message: CREATE NEW TECHNOLOGY LTD

FedEx attempted, but was unable to complete delivery of the following shipment:

Reference: 3653601600678050 /C.KUELLING

Ship (P/U) date: Nov 21, 2014 Estimated delivery: Nov 24, 2014

Service type: FedEx International Priority

Packaging type: FedEx Envelope

Number of pieces: 1 Weight: 1.00 lb.

Special handling/Services: Deliver Weekday

Tracking number: 559753481426

Reason Delivery Not Completed Recommended Action

1. Refused by recipient Call Shipper/Recipient to resolve problem,

then contact us at

https://www.fedex.com/insight/info/contactus.jsp

to advise FedEx of needed action.

Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 8:51 PM CST on 11/23/2014.

To learn more about FedEx Express, please visit our website at fedex.com.

All weights are estimated.

Estimated Delivery displayed above is not valid for Money-Back Guarantee or delay claim purposes. Shipments delayed because of Customs or other regulatory delays are not subject to refund or credit under FedEx Money-Back Guarantee Policy. Please see FedEx Service Guide for terms and conditions of service, including FedEx Money-Back Guarantee. For more information, please contact your FedEx Customer Support representative.

To track the status of this shipment online, please use the following: https://www.fedex.com/insight/findit/nrp.jsp?tracknumbers=559753481426&language=en&opco=FX&clientype=ivother

This tracking update has been sent to you by FedEx on the behalf of the Requestor noted above. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and fedex.com's terms of use, go to fedex.com.

Thank you for your business.

----- Original message -----

From: "Cate, Christian" < Christian.Cate@dish.com>

Date:12/01/2014 11:01 AM (GMT-05:00)

To: "Kuelling, Chris" < < Chris.Kuelling@dish.com >

Cc:

Subject: FW: FedEx Delivery Exception

Hi Chris.

Looks like this one will be coming back, to us.

Thx

Christian H. Cate Shipping and Receiving Dish / BB / Echostar Meridian Corporate Headquarters

Phone: 303-723-3349

E-mail: christian.cate@dish.com

----Original Message-----

From: trackingupdates@fedex.com [mailto:trackingupdates@fedex.com]

Sent: Sunday, November 30, 2014 8:19 PM

To: Cate, Christian

Subject: FedEx Delivery Exception

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 14 of 95 Page ID #:1740

This tracking update has been requested by:

Company Name: DISH NETWORK / ECHOSTAR

Name: SCOTT FOSTER

E-mail: <u>CHRIS.KUELLING@DISH.COM</u>

Message: CREATE NEW TECHNOLOGY LTD

FedEx attempted, but was unable to complete delivery of the following shipment:

Reference: 3653601600678050 /C.KUELLING

Ship (P/U) date: Nov 21, 2014 Estimated delivery: Nov 24, 2014

Service type: FedEx International Priority

Packaging type: FedEx Envelope

Number of pieces: 1 Weight: 1.00 lb.

Special handling/Services: Deliver Weekday

Tracking number: 559753481426

Reason Delivery Not Completed Recommended Action

1. Unable to deliver shipment, No action is required. The package is being

returned to shipper returned to the shipper.

Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 9:18 PM CST on 11/30/2014.

To learn more about FedEx Express, please visit our website at fedex.com.

All weights are estimated.

Estimated Delivery displayed above is not valid for Money-Back Guarantee or delay claim purposes. Shipments delayed because of Customs or other regulatory delays are not subject to refund or credit under FedEx Money-Back Guarantee Policy. Please see FedEx Service Guide for terms and conditions of service, including FedEx Money-Back Guarantee. For more information, please contact your FedEx Customer Support representative.

To track the status of this shipment online, please use the following: https://www.fedex.com/insight/findit/nrp.jsp?tracknumbers=559753481426&language=en&opco=FX&clientype=ivother

This tracking update has been sent to you by FedEx on the behalf of the Requestor noted above. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and fedex.com's terms of use, go to fedex.com.

Thank you for your business.

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 16 of 95 Page ID #:1742

From: Kuelling, Chris < Chris.Kuelling@dish.com>

Sent: Monday, December 08, 2014 7:15 PM

To: 'sales@creatent.net'; 'help@itvpad.com'

Subject: TVpad

Attachments: Create New Technology (11-20-2014 letter).pdf

Dear Sir or Madame,

Please see attached letter.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs DISH Network L.L.C. 9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444

Mobile: (720) 878-6951

Fax: (303) 723-2062

Email: chris.kuelling@dish.com



DISH Network L.L.C. P.O. Box 6663, Englewood, CO 80155-6663 303 723-1000

November 20, 2014

Via Federal Express and Email

Create New Technology (HK) Limited Room D, 10/F Tower A, Billion Centre 1 Wang Kwong Road Kowloon Bay, Kowloon HONG KONG

Email: sales@creatent.net; help@itvpad.com

Re: Infringement of Programming

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that CNT manufactures a set-top device known as the "TVpad" and sells the device through a global network of distributors, including distributors in the United States. As you are aware, the TVpad device enables customers to view pirated television programming (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. It is our understanding

that CNT makes no payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized CNT or any other party to make CCTV or TVB content available through the TVpad. The unauthorized reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law.

It is our understanding that CNT is responsible not only for manufacture and sale of the TVpad device, but also for acquiring, reproducing and making available the unauthorized content on the device through an "app store," by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that CNT and/or persons acting in concert with CNT are directly infringing the copyrights in television programming for which DISH, CCTV and/or TVB own exclusive rights, as well as inducing, materially contributing to, and failing to control the blatant infringing activities of others through the TVpad device.

Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided by CNT and/or persons acting in concert with CNT. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means—whether live, time-delayed, or on-demand—is infringing.

We demand that CNT and any parties acting in concert with CNT, or pursuant to CNT's direction or control, immediately: (a) cease and desist providing CCTV and TVB content through the TVpad and its affiliated network; and (b) cease and desist providing the applications listed in Exhibit A, and any similar infringing applications, through the TVpad app store or otherwise. The continued reproduction, performance, display, and distribution of CCTV and TVB content following receipt of this letter may constitute willful infringement.

We note that CNT has not designated an agent under the Digital Millennium Copyright Act ("DMCA") for notification of claims of infringement pursuant to Section 512(c) of the DMCA. However, for the avoidance of doubt, in the unlikely event that any of the infringing content delivered through the TVpad app store and the applications available therein is provided by third parties, this letter constitutes notice on behalf of DISH, CCTV and TVB, under 17 U.S.C. § 512(c)(3)(A), that DISH, CCTV and TVB have a good faith belief that the reproduction, performance, display, and distribution of these applications, and the content provided through these applications including the representative programming listed on Exhibit B, is not authorized and infringes the respective rights of DISH, CCTV and TVB in their copyrighted works. We accordingly demand that you remove or disable access to the infringing material. If you fail to do so, you may be liable for damages and injunctive relief. I certify that the information we have provided is accurate and that, under penalty of perjury, I am authorized to act on behalf of DISH, CCTV and TVB, owners of the rights infringed by the above-referenced content.

This letter is without prejudice to any of DISH's, CCTV's or TVB's rights or remedies at law or in equity, all of which are specifically reserved.

Chris Kuelling

Sincercty,

Senior Vice President, International Business & Legal Affairs

DISH Network L.L.C.

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 20 of 95 Page ID #:1746

From:

Kuelling, Chris < Chris.Kuelling@dish.com>

Sent:

Monday, December 08, 2014 6:59 PM

To:

'sales@tvpad.com'

Subject:

TVpad

Attachments:

Asha Media (11-20-2014 letter).pdf

Dear Sir or Madame,

Please see attached letter.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs DISH Network L.L.C. 9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444 Mobile: (720) 878-6951 Fax: (303) 723-2062 Email: chris.kuelling@dish.com



DISH Network L.L.C. P.O. Box 6663, Englewood, CO 80155-6663 303 723-1000

November 20, 2014

Via Federal Express and Email

Asha Media/TVpad.com PO Box 6282 Brandon, Florida 33511

411 Walnut Street Suite #5900 Green Cove Springs, FL, 32043

Email: sales@tvpad.com

Re: Infringement of Programming

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that Asha Media is currently selling a set-top device known as the "TVpad" that enables customers to view pirated television broadcasts (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. We also understand that Asha Media promotes the availability of

TVB and CCTV programming through the TVpad device. It is our further understanding that neither Asha Media nor any other party makes any payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized Asha Media or any other party to make content available through the TVpad. The unauthorized reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law, as does the advertising and promotion of the availability of—and the encouragement of consumers to access—such infringing content.

It is our understanding that pirated CCTV and TVB content on the TVpad device is made available to your customers without authorization through an "app store," by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that the parties responsible for acquiring, reproducing, and transmitting pirated CCTV and TVB content on the device, as well as customers who purchase and use the TVpad device, may directly infringe the copyrights in television programming for which DISH, CCTV and/or TVB owns exclusive rights. Asha Media is therefore liable for secondary copyright infringement because of its involvement in the sale and distribution of TVpad devices, its inducement of customers to infringe CCTV and TVB programming, and its material contribution to the infringing activities of others. Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided through those applications. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means whether live, time-delayed, or on-demand—is infringing.

We demand that Asha Media immediately: (a) cease and desist selling TVpad devices that offer the applications listed in Exhibit A, or any similar infringing applications, through the TVpad app store; (b) cease and desist providing the applications listed in Exhibit A, and any similar applications; and (c) cease and desist marketing and promoting the availability of CCTV and TVB content on the TVpad, and encouraging consumers to access such content through the TVpad. Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH's, CCTV's or TVB's rights or remedies at law or in equity, all of which are specifically reserved.

Chris Kuelling

Senior Vice President, International Business & Legal Affairs

DISH Network L.L.C.

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 23 of 95 Page ID #:1749

From: Kuelling, Chris < Chris.Kuelling@dish.com>
Sent: Monday, December 08, 2014 7:12 PM

To: 'clubtvpad@domainsbyproxy.com'

Subject: TVpad

Attachments: Club TVpad (11-20-2014 letter).pdf

Dear Sir or Madame,

Please see attached letter.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs DISH Network L.L.C. 9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444
Mobile: (720) 878-6951
Fax: (303) 723-2062
Email: chris.kuelling@dish.com



DISH Network L.L.C. P.O. Box 6663, Englewood, CO 80155-6663 303.723-1000

November 20, 2014

Via Federal Express and Email

Club TVpad, Inc. 3240 Shawn Way Hayward, California 94541

Email: clubtypad.com@domainsbyproxy.com

Re: Infringement of Programming

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that Asha Media is currently selling a set-top device known as the "TVpad" that enables customers to view pirated television broadcasts (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. We also understand that Asha Media promotes the availability of TVB and CCTV programming through the TVpad device. It is our further understanding that neither Asha Media nor any other party makes any payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized Asha Media or any other party to make content available through the TVpad. The unauthorized

reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law, as does the advertising and promotion of the availability of—and the encouragement of consumers to access—such infringing content.

It is our understanding that pirated CCTV and TVB content on the TVpad device is made available to your customers without authorization through an "app store," by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that the parties responsible for acquiring, reproducing, and transmitting pirated CCTV and TVB content on the device, as well as customers who purchase and use the TVpad device, may directly infringe the copyrights in television programming for which DISH, CCTV and/or TVB owns exclusive rights. Asha Media is therefore liable for secondary copyright infringement because of its involvement in the sale and distribution of TVpad devices, its inducement of customers to infringe CCTV and TVB programming, and its material contribution to the infringing activities of others. Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided through those applications. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means whether live, time-delayed, or on-demand—is infringing.

We demand that Asha Media immediately: (a) cease and desist selling TVpad devices that offer the applications listed in Exhibit A, or any similar infringing applications, through the TVpad app store; (b) cease and desist providing the applications listed in Exhibit A, and any similar applications; and (c) cease and desist marketing and promoting the availability of CCTV and TVB content on the TVpad, and encouraging consumers to access such content through the TVpad. Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH's, CCTV's or TVB's rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely

Chris Kuelling

Senior Vice President, International Business & Legal Affairs

DISH Network L.L.C.

From: tvboxplayer@gmail.com [mailto:tvboxplayer@gmail.com] On Behalf Of TVPad Authorized Store

Sent: Monday, December 08, 2014 6:43 PM

To: Kuelling, Chris **Subject:** Re: TVpad

Dear Chris,

I believe you are trying to contact the manufacturer which is www.itvpad.com

We are only a reseller.. just like amazon, rakutan and sears also selling the product.

All legal matters go to the manufacturer. Let me know if I can be of assistance.

Regards, Amit 2017871546

On Dec 8, 2014 6:59 PM, "Kuelling, Chris" < Chris.Kuelling@dish.com > wrote:

Dear Sir or Madame.

Please see attached letter.

Regards,

Chris

Chris Kuelling

SVP, International Business and Legal Affairs

DISH Network L.L.C.

9601 S. Meridian Boulevard

Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444

Mobile: (720) 878-6951

Fax:

(303) 723-2062

Email:

chris.kuelling@dish.com

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 30 of 95 Page ID #:1756

From:

Kuelling, Chris

Sent: To: Tuesday, December 16, 2014 10:54 AM 'sales@creatent.net'; 'help@itvpad.com'

Subject:

RE: TVpad

Attachments:

Create New Technology (11-20-14 letter with attachments).pdf

Dear Sir or Madame,

It has come to my attention that the attachments to my November 20 letter were inadvertently not included and I am therefore resending with attachments.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs

DISH Network L.L.C. 9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444

Mobile: (720) 878-6951

Fax: (303) 723-2062

Email: chris.kuelling@dish.com

From: Kuelling, Chris

Sent: Monday, December 08, 2014 5:15 PM **To:** 'sales@creatent.net'; 'help@itvpad.com'

Subject: TVpad

Dear Sir or Madame,

Please see attached letter.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs DISH Network L.L.C.

9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A. Direct: (303) 723-1444

Mobile: (720) 878-6951 Fax: (303) 723-2062 Email: <u>chris.kuelling@dish.com</u>



DISH Network L.L.C. P.O. Box 6663, Englewood, CO 80155-6663 303,723-1000

November 20, 2014

Via Federal Express and Email

Create New Technology (HK) Limited Room D, 10/F Tower A, Billion Centre 1 Wang Kwong Road Kowloon Bay, Kowloon HONG KONG

Email: sales@creatent.net; help@itvpad.com

Re: Infringement of Programming

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that CNT manufactures a set-top device known as the "TVpad" and sells the device through a global network of distributors, including distributors in the United States. As you are aware, the TVpad device enables customers to view pirated television programming (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. It is our understanding

that CNT makes no payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized CNT or any other party to make CCTV or TVB content available through the TVpad. The unauthorized reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law.

It is our understanding that CNT is responsible not only for manufacture and sale of the TVpad device, but also for acquiring, reproducing and making available the unauthorized content on the device through an "app store," by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that CNT and/or persons acting in concert with CNT are directly infringing the copyrights in television programming for which DISH, CCTV and/or TVB own exclusive rights, as well as inducing, materially contributing to, and failing to control the blatant infringing activities of others through the TVpad device.

Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided by CNT and/or persons acting in concert with CNT. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means—whether live, time-delayed, or on-demand—is infringing.

We demand that CNT and any parties acting in concert with CNT, or pursuant to CNT's direction or control, immediately: (a) cease and desist providing CCTV and TVB content through the TVpad and its affiliated network; and (b) cease and desist providing the applications listed in Exhibit A, and any similar infringing applications, through the TVpad app store or otherwise. The continued reproduction, performance, display, and distribution of CCTV and TVB content following receipt of this letter may constitute willful infringement.

We note that CNT has not designated an agent under the Digital Millennium Copyright Act ("DMCA") for notification of claims of infringement pursuant to Section 512(c) of the DMCA. However, for the avoidance of doubt, in the unlikely event that any of the infringing content delivered through the TVpad app store and the applications available therein is provided by third parties, this letter constitutes notice on behalf of DISH, CCTV and TVB, under 17 U.S.C. § 512(c)(3)(A), that DISH, CCTV and TVB have a good faith belief that the reproduction, performance, display, and distribution of these applications, and the content provided through these applications including the representative programming listed on Exhibit B, is not authorized and infringes the respective rights of DISH, CCTV and TVB in their copyrighted works. We accordingly demand that you remove or disable access to the infringing material. If you fail to do so, you may be liable for damages and injunctive relief. I certify that the information we have provided is accurate and that, under penalty of perjury, I am authorized to act on behalf of DISH, CCTV and TVB, owners of the rights infringed by the above-referenced content.

This letter is without prejudice to any of DISH's, CCTV's or TVB's rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely,

Chris Kuelling

Senior Vice President, International Business & Legal Affairs

DISH Network L.L.C.

Exhibit A

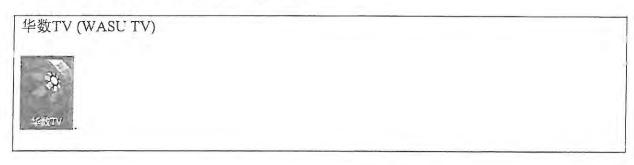
TVpad "Live" Apps

TVpad App and icon	CCTV channels	TVB channels
BETV_HD3	CCTV 1 HD (live)	
BETV II 3 BETV 3	CCTV 1 (live & replay live), CCTV 2 (live), CCTV 3 (live & replay live), CCTV 4 (live & replay live), CCTV 5 (live & replay live), CCTV 5+ (live), CCTV6 (live & replay live), CCTV 10 (live), CCTV 11 (live), CCTV12 (live), CCTV13 (live & replay live), CCTV14 (live & replay live), CCTV风云足球 (CCTV fengyun soccer) (live)	
PETVS	CCTV 4, CCTV 5+, CCTV6, CCTV 10, CCTV 11, CCTV12, CCTV13, CCTV14, CCTV风云足球(CCTV fengyun soccer) (all live)	
粤海時移3 (Yue Hai Shi Yi 3)		JADE HD, JADE (both time- shifted by 12 hours)
粤海寬頻3 (Yue Hai Kuan Pin 3)		JADE HD, JADE HD, J2, JADE, PEARL, interactive News (all live)
粤海寬頻23 (Yue Hai Kuan Pin 23)		JADE HD, JADE, J2, PEARL, interactive News, JADE HD (live and replay live)

516TV		TVBS (live)
516網路電視3 (516 Online TV 3)	CCTV4 (live)	TVBS (live)
HITV		JADE HD, J2, JADE, Pearl, interactive News (live)
港粤網絡電視 (Gang Yue Wang Luo Dian Shi)		JADE HD, JADE, interactive News, J2, Pearl (live and replay live)
粤海直播 (Yue Hai Zhi Bo)		Interactive News, J2, Pearl, JADE, JADE HD (live)
体育online3 (Sport online3) sports	CCTV 1, CCTV 5, CCTV 5+, CCTV风云足球 (CCTV fengyun soccer) (all live)	

TVpad On Demand Apps

The following app plays CCTV programming:



The following apps play TVB programming:

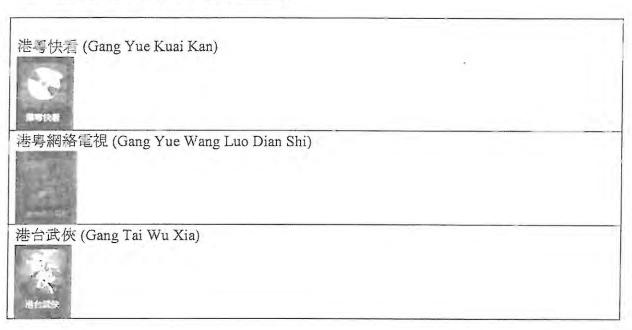


EXHIBIT B

Representative Examples of Programs

CCTV Program Name	Original Broadcast Date	Channel	Application
A constant Charles to the Title	0/22/14	CCT (4	DET (TO
Across the Straight 海峡两岸	9/22/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/23/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/24/14	CCTV-4	BETV
Across the Straight 海峡两岸	9/25/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/27/14	CCTV-4	516
Across the Straight 海峡两岸	9/28/14	CCTV-4	516
Across the Straight 海峡两岸	10/4/14	CCTV-4	516
Across the Straight 海峡两岸	10/5/14	CCTV-4	516
Around China 走遍中国	9/22/14	CCTV-4	BETVII3
Around China 走遍中国	9/23/14	CCTV-4	BETVII3
Around China 走遍中国	9/24/14	CCTV-4	BETV
Around China 走遍中国	9/25/14	CCTV-4	BETVII3
Around China 走遍中国	9/27/14	CCTV-4	516
Around China 走遍中国	9/28/14	CCTV-4	516
Around China 走遍中国	10/4/14	CCTV-4	516
Around China 走遍中国	10/5/14	CCTV-4	516
Art Life 艺术人生	9/25/14	CCTV-3	BETVII3
Art Life 艺术人生	10/3/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	9/26/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	10/3/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	10/5/14	CCTV-3	BETVII3
Fashion Infinite 流行无限	9/28/14	CCTV-4	516
Fashion Infinite 流行无限	10/5/14	CCTV-4	BETVII3
I want to go to the Spring Festival gala 我要上春晚	9/28/14	CCTV-3	BETVII3
I want to go to the Spring Festival gala 我要上春晚	10/5/14	CCTV-3	BETVII3
Star Walk 星光大道	9/25/14	CCTV-3	BETVII3
Star Walk 星光大道	10/3/14	CCTV-3	BETVII3
Star Walk 星光大道	10/4/14	CCTV-3	BETVII3

To A Happy Departure 向幸福出发	9/22/14	CCTV-3	BETVII3
Variety Festival 综艺盛典	9/23/14	CCTV-3	BETVII3

TVB Program Name	Original Broadcast Date	Channel	Application
Pearl News 七點半新聞報導	0/20/14		
Come Home Love 愛回家	9/29/14	Pearl	15
All That is Bitter is Sweet	9/29/14	Jade	15
大藥坊	9/29/14	Jade	15
Line Walker 使徒行者	9/29/14	JadeHD	14
Big Boy's Club 兄弟幫	9/29/14	J2	14
Pleasure & Leisure 都市閒情	9/30/14	Jade	15
Pearl News 七點半新聞報導	9/30/14	Pearl	15
Come Home Love 愛回家	9/30/14	Jade	14
All That is Bitter is Sweet 大藥坊	9/30/14	Jade	15
Line Walker 使徒行者	9/30/14	Jade	15
Big Boy's Club 兄弟常	9/30/14	J2	15
Pleasure & Leisure 都市閒情	10/1/14	Jade	15
Pearl News 七點半新聞報導	10/1/14	Pearl	15
All That is Bitter is Sweet 大藥坊	10/1/14	Jade	HITV
Line Walker 使徒行者	10/1/14	Jade	HITV
Big Boy's Club 兄弟幫	10/1/14	J2	15
Pleasure & Leisure 都市閒情	10/2/14	Jade	15
Come Home Love 愛回家	10/2/14	Jade	15
All That is Bitter is Sweet 大藥坊	10/2/14	Jade	14
Big Boy's Club 兄弟幫	10/2/14	J2	15
	1		
Come Home Love 愛回家	10/3/14	Jade HD	15
Line Walker 使徒行者***	10/3/14	Jade	HITV
Line Walker 使徒行者***	10/3/14	Jade	
Big Boy's Club 兄弟幫	10/3/14	J2	15

A Closer Look 時事多面睇	10/6/14	inews	18
Big Boy's Club 兄弟幫	10/7/14	J2	HITV
Come Home Love 愛回家	10/8/14	Jade	15
Pleasure & Leisure 都市閒情	10/8/14	Jade	17
Big Boy's Club 兄弟幫	10/8/14	J2	15
Pleasure & Leisure 都市閒情	10/9/14	Jade	17
Pearl News 七點半新聞報導	10/9/14	Pearl	15

Additional TVB Programs available on-demand

TVB Program Chinese Name	TVB Program English name	VOD App.
寒山潛龍	Ghost Dragon of Cold Mountain	港粤快看 (gang yue kuai kan)
忠奸人	Black Heart White Soul	港粤快看 (gang yue kuai kan)
愛. 回家	Come Home Love	港粤快看 (gang yue kuai kan)
點金勝手	The Ultimate Addiction	港号快看 (gang yue kuai kan)
我們的天空		港馬快看 (gang yue kuai kan)
食為奴	Gilded Chopsticks	港粤快看 (gang yue kuai kan)
守業者	Storm in a Cocoon	港等快看 (gang yue kuai kan)
單戀雙城	Outbound Love	港粤快看 (gang yue kuai kan)
—————————————————————————————————————	Ruse of Engagement	港粤快看 (gang yue kuai kan)
女人俱樂部	Never Dance Alone	港粤扶看 (gang yue kuai kan)
新抱喜相逢	Queen Divas	港粤快看 (gang yue kuai kan)
貓屎媽媽	Coffee Cat Mama	港等快看 (gang yue kuai kan)
舌劍上的公堂	Return of the Silver Tongue	港粤快看 (gang yue kuai kan)
三輪	Brother's Keeper	港粤快看 (gang yue kuai kan)
我們的天空	Shades of Life	港粤快看 (gang

		yue kuai kan)
0.2 20.7		港粤快看 (gang
My盛Lady	Bounty Lady	yue kuai kan)
Carl Str. Dise.	On The Hippocratic	港粤快看 (gang
Call 36小時II	Crush II	yue kuai kan)
1371.5		港粤决看 (gang
法外風雲	Will Power	yue kuai kan)
		港粵快看 (gang
東張西望 20140804		yue kuai kan)
		港粤快看 (gang
東張西望 20140805		yue kuai kan)
		港写快看 (gang
燭光晚餐		yue kuai kan)
		港粤快看 (gang
沒女大翻身		yue kuai kan)
		港等快看 (gang
食平DD		yue kuai kan)
		港粤快看 (gang
SUNDAY扮嘢王		yue kuai kan)
		港粤央看 (gang
街頭魔法王2		yue kuai kan)
		港學快看 (gang
瘋狂夏水禮		yue kuai kan)
		港粤快看 (gang
夏, 日, 悠遊		yue kuai kan)
		港粤快看 (gang
2014FIFA巴西世界杯-黃金戰報		yue kuai kan)
		港粤 决看 (gang
2014FIFA巴西世界杯-熱爆巴西		yue kuai kan)
		港灣快看 (gang
走過足球聖地		yue kuai kan)
		港粤快看 (gang
决樂聯盟		yue kuai kan)
		港粤網給電視
	Ghost Dragon of	(gang yue wang
寒山潛龍	Cold Mountain	luo dian shi)
		港馬網絡電視
	Black Heart White	(gang yue wang
忠奸人	Soul	luo dian shi)
		港島網络電視
		(gang yue wang
愛. 回家	Come Home Love	luo dian shi)
		港門網絡電視
	The Ultimate	(gang yue wang
站金勝手	Addiction	luo dian shi)

		港弯網絡電視
搵個好男人		(gang yue wang luo dian shi)
燭光晚餐		港粤網絡電視 (gang yue wang luo dian shi)
年代大激鬥		港与網络電視 (gang yue wang luo dian shi)
食平DD		港粤網絡電視 (gang yue wang luo dian shi)
食為奴	Gilded Chopsticks	港粤網絡電視 (gang yue wang luo dian shi)
守業者	Storm in a Cocoon	港粵網絡電視 (gang yue wang luo dian shi)
單戀雙城	Outbound Love	港粵網絡電視 (gang yue wang luo dian shi)
叛逃	Ruse of Engagement	港粵網絡電視 (gang yue wang luo dian shi)
女人俱樂部	Never Dance Alone	港粤網絡電視 (gang yue wang luo dian shi)
新抱喜相逢	Queen Divas	港粤網絡電視 (gang yue wang luo dian shi)
苗屎媽媽	Coffee Cat Mama	港与網絡電視 (gang yue wang luo dian shi)
5劍上的公堂	Return of the Silver Tongue	港粤網絡電視 (gang yue wang luo dian shi)
三輪	Brother's Keeper	港粵網絡電視 (gang yue wang luo dian shi)
战們的天空	Shades of Life	港粤網絡電視 (gang yue wang luo dian shi)
ly盛Lady	Bounty Lady	港粤網路電視 (gang yue wang luo dian shi)

	On The Ulbranestic	港粤網絡宣視
Call 36小時II	On The Hippocratic Crush II	(gang yue wang luo dian shi)
		港粤網絡電視
	1	(gang yue wang
法外風雲	Will Power	luo dian shi)
		港粤網的電視
		(gang yue wang
幸福摩天輪		luo dian shi)
		港写網結電視
was dur. E ch		(gang yue wang
耀舞長安		luo dian shi)
		港島統絡電視
天梯		(gang yue wang
人1初		luo dian shi)
		港粤網絡電視
兼政行動		(gang yue wang luo dian shi)
1/12/1/201		港等網絡電視
		(gang yue wang
心路GPS		luo dian shi)
		港粤網絡電視
		(gang yue wang
熟男有惑		luo dian shi)
		港粤網絡電視
211272		(gang yue wang
师父明白了		luo dian shi)
		港号編終電視
# T #		(gang yue wang
<u> </u>		luo dian shi)
		港島網絡電視
巴不得媽媽		(gang yue wang
7-1 1d Shirk Shirk		luo dian shi)
		港粤網絡電視
f上雲霄2		(gang yue wang luo dian shi)
		港場網絡電視
		(gang yue wang
申探哥倫布		luo dian shi)
		港粤網络電視
1.0.00		(gang yue wang
神鎗追撃		luo dian shi)
		港与網絡宣視
14 %h ##		(gang yue wang
☆枝慾孽Ⅱ		luo dian shi)

圓月彎刀	Against the Blade of Honour	港台武俠 (gang tai wu xia)
天子尋龍	Whatever It Takes	港台武俠 (gang tai wu xia)
天機算	A Change of Destiny	港台武俠 (gang tai wu xia)
太極	The Master of Tai Chi	港台武俠 (gang tai wu xia)
精武門	Fist of Fury	港台武俠 (gang tai wu xia)
洗冤录	Witness to a Prosecution	港台武俠 (gang tai wu xia)
碧血盐枭	Sweetness in the Salt	港台武俠 (gang tai wu xia)
封神榜	Gods of Honour	港台武俠 (gang tai wu xia)
幕后大老爷	Man In Charge	港台武俠 (gang tai wu xia)
倚天屠龍記	Heaven Sword and Dragon Sabre	港台武俠 (gang tai wu xia)
尋秦記	A Step into the Past	港台武俠 (gang tai wu xia)
新方世玉	Heroes Of The Times	港台武俠 (gang tai wu xia)
天龍八部	The Demi-Gods and Semi-Devils	港台武俠 (gang tai wu xia)
神雕侠侣	The Condor Heroes	港台武俠 (gang tai wu xia)
射雕英雄傳	The Legend of the Condor Heroes	港台武俠 (gang tai wu xia)
少年四大名捕	The Four	港台武俠 (gang tai wu xia)
女拳	Grace Under Fire	港台武俠 (gang tai wu xia)
	The Deer and the Cauldron	港台武俠 (gang tai wu xia)
全元甲	Fearless	港台武俠 (gang tai wu xia)
大唐雙龍傳	Twin of Brothers	港台武俠 (gang tai wu xia)

EXHIBIT 101

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 45 of 95 Page ID #:1771

From: Kuelling, Chris

Sent: Tuesday, December 16, 2014 11:03 AM
To: 'clubtypad@domainsbyproxy.com'

Subject: TVpad

Attachments: Club TVpad (11-20-14 letter with cover letter and attachments).pdf

Dear Sir or Madame,

It has come to my attention that the attachments to my November 20 letter were inadvertently not included and I am therefore resending with attachments.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs

DISH Network L.L.C. 9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444 Mobile: (720) 878-6951 Fax: (303) 723-2062 Email: chris kuelling@dish.com

From: Kuelling, Chris

Sent: Monday, December 08, 2014 5:12 PM **To:** 'clubtvpad@domainsbyproxy.com'

Subject: TVpad

Dear Sir or Madame,

Please see attached letter.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs DISH Network L.L.C.

9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444 Mobile: (720) 878-6951 Fax: (303) 723-2062 Email: chris.kuelling.bidish.com



P.O. Box 6663, Englewood, CO 80155-6663 303.723-1000

December 15, 2014

Via Federal Express and Email

Club TVpad, Inc. 3240 Shawn Way Hayward, California 94541

Email: clubtvpad.com@domainsbyproxy.com

Infringement of Programming Re:

To Whom It May Concern:

It has come to my attention that the enclosed letter may have previously been sent without the applicable Exhibits attached. Please find the complete letter enclosed herein.

Chris Kuelling/

Sincerely

Senior Vice President, International Business & Legal Affairs

DISH Network L.L.C.



DISH Network L.L.C. P.O. Box 6663, Englewood, CO 80155-6663 303 723-1000

November 20, 2014

Via Federal Express and Email

Club TVpad, Inc. 3240 Shawn Way Hayward, California 94541

Email: clubtvpad.com@domainsbyproxy.com

Re: <u>Infringement of Programming</u>

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that Asha Media is currently selling a set-top device known as the "TVpad" that enables customers to view pirated television broadcasts (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. We also understand that Asha Media promotes the availability of TVB and CCTV programming through the TVpad device. It is our further understanding that neither Asha Media nor any other party makes any payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized Asha Media or any other party to make content available through the TVpad. The unauthorized

reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law, as does the advertising and promotion of the availability of—and the encouragement of consumers to access—such infringing content.

It is our understanding that pirated CCTV and TVB content on the TVpad device is made available to your customers without authorization through an "app store," by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that the parties responsible for acquiring, reproducing, and transmitting pirated CCTV and TVB content on the device, as well as customers who purchase and use the TVpad device, may directly infringe the copyrights in television programming for which DISH, CCTV and/or TVB owns exclusive rights. Asha Media is therefore liable for secondary copyright infringement because of its involvement in the sale and distribution of TVpad devices, its inducement of customers to infringe CCTV and TVB programming, and its material contribution to the infringing activities of others. Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided through those applications. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means whether live, time-delayed, or on-demand—is infringing.

We demand that Asha Media immediately: (a) cease and desist selling TVpad devices that offer the applications listed in Exhibit A, or any similar infringing applications, through the TVpad app store; (b) cease and desist providing the applications listed in Exhibit A, and any similar applications; and (c) cease and desist marketing and promoting the availability of CCTV and TVB content on the TVpad, and encouraging consumers to access such content through the TVpad. Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH's, CCTV's or TVB's rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely

Chris Kuelling

Senior Vice President, International Business & Legal Affairs

DISH Network L.L.C.

Exhibit A

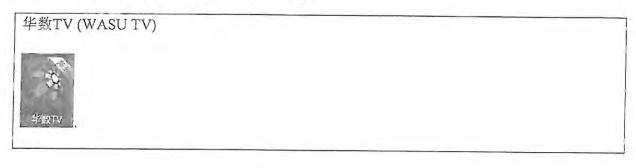
TVpad "Live" Apps

TVpad App and icon	CCTV channels	TVB channels
BETV HD3	CCTV 1 HD (live)	
BETV II 3	CCTV 1 (live & replay live), CCTV 2 (live), CCTV 3 (live & replay live), CCTV 4 (live & replay live), CCTV 5 (live & replay live), CCTV 5+ (live), CCTV6 (live & replay live), CCTV 10 (live), CCTV 11 (live), CCTV12 (live), CCTV13 (live & replay live), CCTV14 (live & replay live), CCTV风云足球 (CCTV fengyun soccer) (live)	
BETV 3	CCTV 1, CCTV 2, CCTV 3, CCTV 4, CCTV 5+, CCTV6, CCTV 10, CCTV 11, CCTV12, CCTV13, CCTV14, CCTV风云足球(CCTV fengyun soccer) (all live)	
写海時移3 (Yue Hai Shi Yi 3)		JADE HD, JADE (both time- shifted by 12 hours)
粤海寬頻3 (Yue Hai Kuan Pin 3)		JADE HD, JADE HD, J2, JADE, PEARL, interactive News (all live)
粤海寬頻23 (Yue Hai Kuan Pin 23)		JADE HD, JADE, J2, PEARL, interactive News, JADE HD (live and replay live)

516TV		TVBS (live)
516網路電視3 (516 Online TV 3)	CCTV4 (live)	TVBS (live)
HITV		JADE HD, J2, JADE, Pearl, interactive News (live)
港粤網絡電視 (Gang Yue Wang Luo Dian Shi)		JADE HD, JADE, interactive News, J2, Pearl (live and replay live)
粤海直播 (Yue Hai Zhi Bo)		Interactive News, J2, Pearl, JADE, JADE HD (live)
体育online3 (Sport online3)	CCTV 1, CCTV 5, CCTV 5+, CCTV风云足球 (CCTV fengyun soccer) (all live)	

TVpad On Demand Apps

The following app plays CCTV programming:



The following apps play TVB programming:

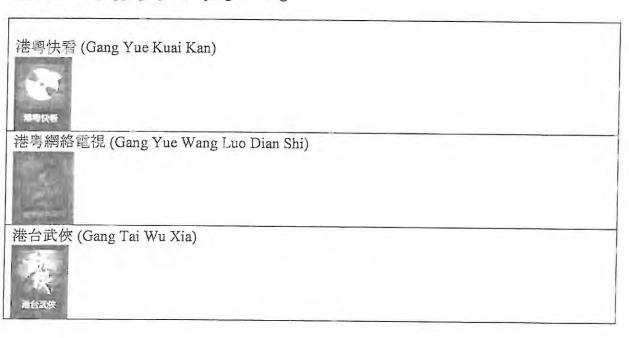


EXHIBIT B

Representative Examples of Programs

CCTV Program Name	Original Broadcast Date	Channel	Application
Across the Straight 海峡两岸	9/22/14	CCTV-4	DET /III
Across the Straight 海峡两岸	9/23/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/24/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/25/14		BETV
Across the Straight 海峡两岸	9/27/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/28/14		516
Across the Straight 海峡两岸	10/4/14	CCTV-4	516
Across the Straight 海峡两岸		CCTV-4	516
ACTOSS THE Straight 海峡网岸	10/5/14	CCTV-4	516
Around China 走遍中国	9/22/14	CCTV-4	BETVII3
Around China 走遍中国	9/23/14	CCTV-4	BETVII3
Around China 走遍中国	9/24/14	CCTV-4	BETV
Around China 走遍中国	9/25/14	CCTV-4	BETVII3
Around China 走遍中国	9/27/14	CCTV-4	516
Around China 走遍中国	9/28/14	CCTV-4	516
Around China 走遍中国	10/4/14	CCTV-4	516
Around China 走遍中国	10/5/14	CCTV-4	516
Art Life 艺术人生	9/25/14	CCTV-3	BETVII3
Art Life 艺术人生	10/3/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	9/26/14	L CCTL 2	
Echo Clear 回声嘹亮		CCTV-3	BETVII3
Echo Clear 回声嘹亮	10/3/14	CCTV-3	BETVII3
ECHO Cledi 回户原元	10/5/14	CCTV-3	BETVII3
Fashion Infinite 流行无限	9/28/14	CCTV-4	516
Fashion Infinite 流行无限	10/5/14	CCTV-4	BETVII3
I want to go to the Spring Festival gala 我要上春晚	9/28/14	CCTV-3	BETVII3
I want to go to the Spring Festival gala 我要上春晚	10/5/14	CCTV-3	BETVII3
Star Walk 星光大道	9/25/14	CCTV-3	BETVII3
Star Walk 星光大道	10/3/14		BETVII3
Star Walk 星光大道	10/4/14		BETVII3

To A Happy Departure 向幸福出发	9/22/14	CCTV-3	BETVII3
Variety Festival 综艺盛典	9/23/14	CCTV-3	BETVII3

TVB Program Name	Original Broadcast Date	Channel	Application
Pearl News 七點半新聞報導	0/20/14		
	9/29/14	Pearl	15
Come Home Love 愛回家	9/29/14	Jade	15
All That is Bitter is Sweet 大藥坊	9/29/14	Jade	15
Line Walker 使徒行者	9/29/14	JadeHD	14
Big Boy's Club 兄弟幫	9/29/14	J2	14
Pleasure & Leisure 都市閒情	9/30/14	Jade	15
Pearl News 七點半新聞報導	9/30/14	Pearl	15
Come Home Love 愛回家	9/30/14	Jade	14
All That is Bitter is Sweet 大藥坊	9/30/14	Jade	15
Line Walker 使徒行者	9/30/14	Jade	15
Big Boy's Club 兄弟幫	9/30/14	J2	15
Pleasure & Leisure 都市閒情	10/1/14	Jade	15
Pearl News 七點半新聞報導	10/1/14	Pearl	15
All That is Bitter is Sweet 大藥坊	10/1/14	Jade	HITV
Line Walker 使徒行者	10/1/14	Jade	HITV
Big Boy's Club 兄弟幫	10/1/14	J2	15
Pleasure & Leisure 都市閒情	10/2/14	Jade	15
Come Home Love 愛回家	10/2/14	Jade	15
All That is Bitter is Sweet			
大藥坊	10/2/14	Jade	14
Big Boy's Club 兄弟幫	10/2/14	J2	15
6			
Come Home Love 愛回家	10/3/14	Jade HD	15
Line Walker 使徒行者***	10/3/14	Jade	HITV
Line Walker 使徒行者***	10/3/14	Jade	
Big Boy's Club 兄弟幫	10/3/14	J2	15

A Closer Look 時事多面睇	10/6/14	inews	18
Big Boy's Club 兄弟幫	10/7/14	J2	HITV
Come Home Love 愛回家	10/8/14	Jade	15
Pleasure & Leisure 都市閒情	10/8/14	Jade	17
Big Boy's Club 兄弟幫	10/8/14	J2	15
Pleasure & Leisure 都市閒情	10/9/14	Jade	17
Pearl News 七點半新聞報導	10/9/14	Pearl	15

Additional TVB Programs available on-demand

TVB Program Chinese Name	TVB Program English name	VOD App.
寒山潛龍	Ghost Dragon of Cold Mountain	港粤快看 (gang yue kuai kan)
忠奸人	Black Heart White Soul	港粤快看 (gang yue kuai kan)
愛. 回家	Come Home Love	港灣快看 (gang yue kuai kan)
點金勝手	The Ultimate Addiction	港粤快看 (gang yue kuai kan)
我們的天空		港粤快看 (gang yue kuai kan)
食為奴	Gilded Chopsticks	港海快看 (gang yue kuai kan)
守業者	Storm in a Cocoon	港粤快看 (gang yue kuai kan)
單戀雙城	Outbound Love	港粤快看 (gang yue kuai kan)
—————————————————————————————————————	Ruse of Engagement	港粤快看 (gang yue kuai kan)
女人俱樂部	Never Dance Alone	港灣快看 (gang yue kuai kan)
新抱喜相逢	Queen Divas	港島快看 (gang yue kuai kan)
貓屎媽媽	Coffee Cat Mama	港与快看 (gang yue kuai kan)
舌劍上的公堂	Return of the Silver Tongue	港粤快看 (gang yue kuai kan)
巨輪	Brother's Keeper	港粤快看 (gang yue kuai kan)
我們的天空	Shades of Life	港号快看 (gang

		yue kuai kan)
NA 50 1		港島快看 (gang
My盛Lady	Bounty Lady	yue kuai kan)
o u po di princi	On The Hippocratic	港馬快看 (gang
Call 36小時II	Crush II	yue kuai kan)
14.0 mm		港粤快看 (gang
法外風雲	Will Power	yue kuai kan)
		港粤快看 (gang
東張西望 20140804		yue kuai kan)
		港平快看 (gang
東張西望 20140805		yue kuai kan)
		港粤快看 (gang
燭光晚餐		yue kuai kan)
		港粤快和 (gang
沒女大翻身		yue kuai kan)
		港粤快看 (gang
食平DD		yue kuai kan)
		港粤快看 (gang
SUNDAY扮嘢王		yue kuai kan)
		港粤快看 (gang
街頭魔法王2		yue kuai kan)
		港粤快看 (gang
瘋狂夏水禮		yue kuai kan)
		港粤快看 (gang
夏、日、悠遊		yue kuai kan)
		港粤快看 (gang
2014FIFA巴西世界杯-黃金戰報		yue kuai kan)
		港粤快看 (gang
2014FIFA巴西世界杯-熱爆巴西		yue kuai kan)
		港粤快看 (gang
走過足球聖地	/V	yue kuai kan)
		港号快看 (gang
央樂聯盟		yue kuai kan)
		港粤網絡電視
	Ghost Dragon of	(gang yue wang
寒山潛龍	Cold Mountain	luo dian shi)
		港學維約電視
	Black Heart White	(gang yue wang
8好人	Soul	luo dian shi)
- 10 mmmmm - 10 mmmm - 10 mmm - 10 m		港等網絡電視
		(gang yue wang
愛. 回家	Come Home Love	luo dian shi)
		港界網絡電視
	The Ultimate	(gang yue wang
占金勝手	Addiction	luo dian shi)

		港粤網結電視
搵個好男人		(gang yue wang luo dian shi)
		港等網絡電視
燭光晚餐		(gang yue wang
烟儿咒食		luo dian shi)
		港馬網絡電視
年代大激鬥		(gang yue wang luo dian shi)
		港粤網絡電視
		(gang yue wang
食平DD		luo dian shi)
		港粵網絡電視
A # #0	1	(gang yue wang
食為奴	Gilded Chopsticks	luo dian shi)
		港等網絡電視
守業者	Storm in a Cocoon	(gang yue wang
7.7-1	Storm in a Cocoon	luo dian shi) 港島網絡電視
		(gang yue wang
單戀雙城	Outbound Love	luo dian shi)
		港粵網絡電視
tion of the		(gang yue wang
叛逃	Ruse of Engagement	luo dian shi)
		港号網的電視
女人俱樂部	Name Day of N	(gang yue wang
×八尺未叩	Never Dance Alone	luo dian shi)
	1	港粤網絡電視
 新抱喜相逢	Queen Divas	(gang yue wang luo dian shi)
	1 2 2 3 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	港粤網絡電視
		(gang yue wang
苗屎媽媽	Coffee Cat Mama	luo dian shi)
		港粤網絡電視
	Return of the Silver	(gang yue wang
F劍上的公堂 ————————————————————————————————————	Tongue	luo dian shi)
三本会		港哥網絡電視
三輪	Brother's Keeper	(gang yue wang
	promer's keeper	luo dian shi) 港粵網絡電視
		使导致态电优 (gang yue wang
战們的天空	Shades of Life	luo dian shi)
		港号網絡電視
		(gang yue wang
Ny盛Lady	Bounty Lady	luo dian shi)

	On The Hippocratic	港粤網絡電視 (gang yue wang
Call 36小時II	Crush II	luo dian shi)
		港粤網絡電視
		(gang yue wang
法外風雲	Will Power	luo dian shi)
		港等網絡電視
	1	(gang yue wang
幸福摩天輪		luo dian shi)
		港粵網絡電視
卿無 巨力		(gang yue wang
耀舞長安		luo dian shi)
		港粤網絡電視
天梯		(gang yue wang
人物		luo dian shi)
		港粤網絡電視
棄政行動		(gang yue wang luo dian shi)
1120		港等網絡電視
		(gang yue wang
)路GPS		luo dian shi)
		港粤網絡電視
		(gang yue wang
热男有惑		luo dian shi)
		港粵網絡電視
		(gang yue wang
市父明白了		luo dian shi)
		港号網絡電視
L		(gang yue wang
生王者		luo dian shi)
		港馬網絡電視
工作作		(gang yue wang
已不得媽媽		luo dian shi)
		港粤網絡電視
上雲霄2		(gang yue wang
上云何4		luo dian shi)
		港粤網絡電視
探哥倫布		(gang yue wang luo dian shi)
sets as HMC atta		港等網絡電視
		(gang yue wang
1 鎗追擊		luo dian shi)
		港粵網絡電視
		(gang yue wang
ὰ枝慾孽Ⅱ		luo dian shi)

圆月彎刀	Against the Blade of Honour	港台武俠 (gang ta wu xia)
天子尋龍	Whatever It Takes	港台武俠 (gang tai wu xia)
天機算	A Change of Destiny	港台武俠 (gang tai wu xia)
太極	The Master of Tai Chi	港台武俠 (gang tai wu xia)
精武門	Fist of Fury	港台武俠 (gang tai wu xia)
洗冤录	Witness to a Prosecution	港台武俠 (gang tai wu xia)
碧血盐枭	Sweetness in the Salt	港台武俠 (gang tai wu xia)
封神榜	Gods of Honour	港台武俠 (gang tai wu xia)
幕后大老爷	Man In Charge	港台武俠 (gang tai wu xia)
倚天屠龍記	Heaven Sword and Dragon Sabre	港台武俠 (gang tai wu xia)
尋秦記	A Step into the Past	港台武俠 (gang tai wu xia)
新方世玉	Heroes Of The Times	港台武俠 (gang tai wu xia)
天龍八部	The Demi-Gods and Semi-Devils	港台武俠 (gang tai wu xia)
神雕侠侣	The Condor Heroes	港台武俠 (gang tai wu xia)
射雕英雄傳	The Legend of the Condor Heroes	港台武俠 (gang tai wu xia)
少年四大名捕	The Four	港台武俠 (gang tai wu xia)
女拳	Grace Under Fire	港台武俠 (gang tai wu xia)
	The Deer and the Cauldron	港台武俠 (gang tai wu xia)
 電元甲		港台武俠 (gang tai wu xia)
大唐雙龍傳	-1.00	港台武俠 (gang tai wu xia)

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 60 of 95 Page ID #:1786

From:

Kuelling, Chris

Sent:

Friday, December 19, 2014 4:16 PM

To:

'TVPad Authorized Store'

Subject:

RE: TVpad

Attachments:

Asha Media (12-19-2014).pdf

Dear Amit,

Please see the attached response to your December 8 email.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs DISH Network L.L.C.

9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444 Mobile: (720) 878-6951 Fax: (303) 723-2062 Email: chris.kuelling@dish.com

From: tvboxplayer@gmail.com [mailto:tvboxplayer@gmail.com] On Behalf Of TVPad Authorized Store

Sent: Monday, December 08, 2014 6:43 PM

To: Kuelling, Chris Subject: Re: TVpad

Dear Chris,

I believe you are trying to contact the manufacturer which is www.itvpad.com

We are only a reseller.. just like amazon, rakutan and sears also selling the product.

All legal matters go to the manufacturer. Let me know if I can be of assistance.

Regards, Amit 2017871546

On Dec 8, 2014 6:59 PM, "Kuelling, Chris" < Chris. Kuelling@dish.com> wrote:

Dear Sir or Madame,

Please see attached letter.

Regards,

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 61 of 95 Page ID #:1787

Chris

Chris Kuelling

SVP, International Business and Legal Affairs

DISH Network L.L.C.

9601 S. Meridian Boulevard

Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444

Mobile: (720) 878-6951

Fax: (303) 723-2062

Email: chris.kuelling@dish.com



DISH Network L.L.C. P.O. Box 6663, Englewood, CO 80155-6663 303.723-1000

December 19, 2014

Asha Media/TVpad.com ATTN: Amit Bhalla PO Box 6282 Brandon, Florida 33511

411 Walnut Street Suite #5900 Green Cove Springs, FL, 32043

Re: <u>Infringement of Programming</u>

Dear Mr. Bhalla:

I am writing in reply to your email of December 8, 2014, which responded to our cease and desist letter of November 20, 2014 concerning Asha Media's sale of the TVpad device and promotion of the TVpad's infringing capabilities.

We strongly disagree with your statement that Asha Media is "only a reseller" of the TVpad device. In addition to selling a device that delivers pirated content, Asha Media actively induces and encourages customers to purchase and use the TVpad device in order to access and infringe copyrighted Chinese-language television programs, including CCTV and TVB programs. In light of these activities, Asha Media is secondarily liable for the infringing conduct of its customers who use the TVpad device, as well as for the infringing conduct of other parties streaming pirated CCTV and TVB content to the TVpad device.

We understand that the exhibits to our prior letter may not have been attached. Therefore, attached hereto as Exhibit A is a list of applications available on the TVpad Store that provide infringing content, and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of CCTV and TVB programs illegally streamed through those applications. We reiterate that all of CCTV and TVB television programming streamed through the TVpad device by whatever means—whether live, time-delayed, or on-demand—is infringing.

We also reiterate our prior demands that Asha Media: <u>immediately (a) cease and desist selling</u> TVpad devices that offer the apps listed in Exhibit A through the TVpad Store; and (b)

cease and desist marketing and promoting the availability of CCTV and TVB content, and encouraging consumers to access such content through the TVpad. Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH's, TVB's or CCTV's rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely,

Chris Kuelling

Senior Vice President

International Business & Legal Affairs

DISH Network L.L.C.

Exhibit A

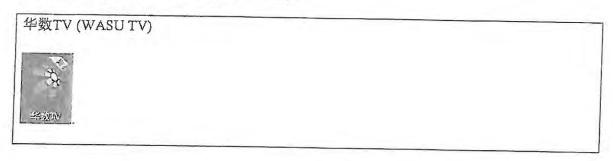
TVpad "Live" Apps

TVpad App and icon	CCTV channels	TVB channels
BETV HD3	CCTV 1 HD (live)	
BETV II 3	CCTV 1 (live & replay live), CCTV 2 (live), CCTV 3 (live & replay live), CCTV 4 (live & replay live), CCTV 5 (live & replay live), CCTV 5+ (live), CCTV 6 (live & replay live), CCTV 10 (live), CCTV 11 (live), CCTV 12 (live), CCTV13 (live & replay live), CCTV14 (live & replay live), CCTV14 (live & replay live), CCTV风云足球 (CCTV fengyun soccer) (live) CCTV 1, CCTV 2, CCTV 3, CCTV 4, CCTV 5+, CCTV6, CCTV 10, CCTV 11,	
BETVS 粤海時移3 (Yue Hai Shi Yi 3)	CCTV12, CCTV13, CCTV14, CCTV风云足球 (CCTV fengyun soccer) (all live)	
(1 de 11di bili 113)		JADE HD, JADE (both time- shifted by 12 hours)
写海寬頻3 (Yue Hai Kuan rin 3)		JADE HD, JADE HD, J2, JADE, PEARL, interactive News (all live)
图海寬頻23 (Yue Hai Kuan in 23)		JADE HD, JADE, J2, PEARL, interactive News, JADE HD (live and replay live)

516TV		TVBS (live)
[™] 51\\$ ² (∏V		
516網路電視3 (516 Online TV 3)	CCTV4 (live)	TVBS (live)
50倍向後主張之 HITV 'hilfry'		JADE HD, J2, JADE, Pearl, interactive News (live)
善專網絡電視 (Gang Yue Vang Luo Dian Shi)		JADE HD, JADE, interactive News, J2, Pearl (live and replay live)
學海直播 (Yue Hai Zhi Bo)		Interactive News, J2, Pearl, JADE, JADE HD (live)
育online3 (Sport online3)	CCTV 1, CCTV 5, CCTV 5+, CCTV风云足球 (CCTV fengyun soccer) (all live)	

TVpad On Demand Apps

The following app plays CCTV programming:



The following apps play TVB programming:

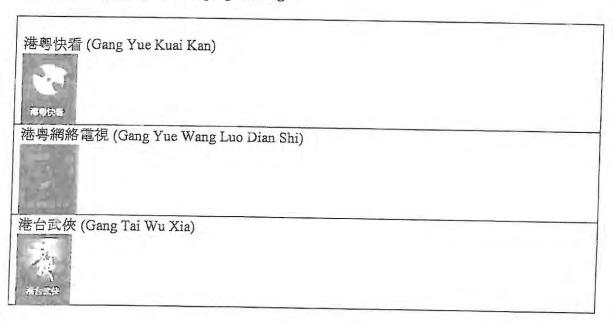


EXHIBIT B

Representative Examples of Programs

CCTV Program Name	Original Broadcast Date	Channe	Application
Across the Straight 海峡两岸	9/22/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/23/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/24/14	CCTV-4	BETV
Across the Straight 海峡两岸	9/25/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/27/14	CCTV-4	516
Across the Straight 海峽两岸	9/28/14	CCTV-4	516
Across the Straight 海峡两岸	10/4/14	CCTV-4	516
Across the Straight 海峡两岸	10/5/14	CCTV-4	516
Around China 走遍中国	9/22/14	CCTV-4	BETVII3
Around China 走遍中国	9/23/14	CCTV-4	BETVII3
Around China 走源中国	9/24/14	CCTV-4	BETV
Around China 走遍中国	9/25/14	CCTV-4	BETVII3
Around China 走遍中国	9/27/14	CCTV-4	516
Around China 走遍中国	9/28/14	CCTV-4	516
Around China 走遍中国	10/4/14	CCTV-4	516
Around China 走遍中国	10/5/14	CCTV-4	516
Art Life 艺术人生	9/25/14	CCTV-3	BETVII3
Art Life 艺术人生	10/3/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	9/26/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	10/3/14	CCTV-3	
Echo Clear 回声嘹亮	10/5/14	CCTV-3	BETVII3 BETVII3
Fashion Infinite 流行无限	9/28/14	CCTV-4	Ede
Fashion Infinite 流行无限	10/5/14		516
Tasmon immee milinate	10/3/14	CCTV-4	BETVII3
Festival gala 我要上春晚	9/28/14	CCTV-3	BETVII3
I want to go to the Spring Festival gala 我要上春晚	10/5/14	CCTV-3	BETVII3
Star Walk 星光大道	9/25/14	CCTV-3 E	BETVII3
Star Walk 星光大道	10/3/14		BETVII3
Star Walk 星光大道	10/4/14		BETVII3

To A Happy Departure 向幸福出发	9/22/14	CCTV-3	BETVII3
Variety Festival 综艺盛典	9/23/14	CCTV-3	BETVII3

TVB Program Name	Original Broadcast Date	Channel	Application
Pearl News 七點半新聞報導	9/29/14	Pearl	15
Come Home Love 愛回家	9/29/14	Jade	15
All That is Bitter is Sweet 大藥坊	9/29/14	Jade	15
Line Walker 使徒行者	9/29/14	JadeHD	14
Big Boy's Club 兄弟幫	9/29/14	J2	14
Pleasure & Leisure 都市閒情	0/20/14	7	
Pearl News 七點半新聞報導	9/30/14	Jade	15
Come Home Love 愛回家	9/30/14	Pearl	15
All That is Bitter is Sweet 大藥坊	9/30/14	Jade Jade	15
Line Walker 使徒行者	9/30/14	Jade	15
Big Boy's Club 兄弟幫	9/30/14	J2	15
Pleasure & Leisure 都市閒情 Pearl News 七點半新聞報導	10/1/14 10/1/14	Jade Pearl	15 15
All That is Bitter is Sweet 大藥坊	10/1/14	Jade	HITV
Line Walker 使徒行者	10/1/14	Jade	HITV
Big Boy's Club 兄弟幫	10/1/14	J2	15
Pleasure & Leisure 都市閒情	10/2/14	Jade	15
Come Home Love 愛回家	10/2/14	Jade	15
All That is Bitter is Sweet 大藥坊	10/2/14		14
Big Boy's Club 兄弟幫	10/2/14	J2	15
Come Home Love 愛回家	10/3/14		15
Line Walker 使徒行者***	10/3/14		HITV
Line Walker 使徒行者***	10/3/14	Jade	
Big Boy's Club 兄弟幫	10/3/14	J2 :	15

A Closer Look 時事多面睇	10/6/14	inews	18
		IIICWS	10
Big Boy's Club 兄弟常	10/7/14	J2	HITV
Come Home Love 愛回家	10/8/14	Jade	15
Pleasure & Leisure 都市閒情	10/8/14	Jade	17
Big Boy's Club 兄弟幫	10/8/14	J2	15
Pleasure & Leisure 都市閒情	10/9/14	Jade	17
Pearl News 七點半新聞報導	10/9/14	Pearl	15

Additional TVB Programs available on-demand

TVB Program Chinese Name	TVB Program English name	VOD App.
寒山潛龍	Ghost Dragon of Cold Mountain	港粤快看 (gang yue kuai kan)
忠奸人	Black Heart White Soul	港粤快看 (gang yue kuai kan)
愛. 回家	Come Home Love	港粤快看 (gang yue kuai kan)
點金勝手	The Ultimate Addiction	港粤快看 (gang yue kuai kan)
我們的天空		港粤快看 (gang yue kuai kan)
食為奴	Gilded Chopsticks	港粤快看 (gang yue kuai kan)
守業者	Storm in a Cocoon	港粤快看 (gang yue kuai kan)
單戀雙城	Outbound Love	港粤快看 (gang yue kuai kan)
叛逃	Ruse of Engagement	港粤快看 (gang yue kuai kan)
女人俱樂部	Never Dance Alone	港粤快看 (gang yue kuai kan)
新抱喜相逢	Queen Divas	港粤快看 (gang yue kuai kan)
貓屎媽媽	Coffee Cat Mama	港粤快看 (gang yue kuai kan)
舌劍上的公堂	Return of the Silver Tongue	港粤快看 (gang yue kuai kan)
巨輪	Brother's Keeper	港粤快看 (gang yue kuai kan)
	Shades of Life	港粤快看 (gang

		yue kuai kan)
-		港粤快看 (gang
My盛Lady	Bounty Lady	yue kuai kan)
	On The Hippocratio	
Call 36小時II	Crush II	yue kuai kan)
U.S. San		港粤快看 (gang
法外風雲	Will Power	yue kuai kan)
		港粤快看 (gang
東張西望 20140804		yue kuai kan)
		港粤快看 (gang
東張西望 20140805		yue kuai kan)
		港粤快看 (gang
燭光晚餐		yue kuai kan)
Sale Francis		港粤快看 (gang
沒女大翻身		yue kuai kan)
		港粤快看 (gang
食平DD	44/	yue kuai kan)
C. O. C.		港粤快看 (gang
SUNDAY扮嘢王		yue kuai kan)
Vermonia IV and I		港粤快看 (gang
街頭魔法王2		yue kuai kan)
plus Ware Space 1.1 C worth		港門快看 (gang
瘋狂夏水禮		yue kuai kan)
		港粤快看 (gang
夏,日,悠遊		yue kuai kan)
		港粤快看 (gang
2014FIFA巴西世界杯-黃金戰報		yue kuai kan)
		港粤快看 (gang
2014FIFA巴西世界杯-熱爆巴西	1	yue kuai kan)
to the property of		港粤快看 (gang
<u> </u>		yue kuai kan)
1. 646 TAV EIR		港粤快看 (gang
央樂聯盟		yue kuai kan)
		港粤網絡電視
中心,如本本片	Ghost Dragon of	(gang yue wang
『山潜龍	Cold Mountain	luo dian shi)
	DI THE WAR	港粤網絡電視
3奸人	Black Heart White	(gang yue wang
AST X	Soul	luo dian shi)
		港粤網絡電視
. 回家	Compiliant	(gang yue wang
. 四分	Come Home Love	luo dian shi)
	The Ultimate	港粤網絡電視
金勝手	Addiction	(gang yue wang luo dian shi)

		hit the first for the services
		港粤網絡電視
搵個好男人		(gang yue wang luo dian shi)
		港粤網絡電視
燭光晚餐		(gang yue wang luo dian shi)
		港粤網絡電視
15-71-15-16-5		(gang yue wang
年代大激鬥		luo dian shi)
		港粤網絡電視
121		(gang yue wang
食平DD		luo dian shi)
		港粤網絡電視
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	(gang yue wang
食為奴	Gilded Chopsticks	luo dian shi)
		港粤網絡電視
		(gang yue wang
守業者	Storm in a Cocoon	luo dian shi)
		港粤網絡電視
單戀雙城	0.11	(gang yue wang
学心文 观	Outbound Love	luo dian shi)
		港粵網絡電視
叛选	Puso of Engagement	(gang yue wang
77,72	Ruse of Engagement	luo dian shi)
		港粤網絡電視
女人俱樂部	Never Dance Alone	(gang yue wang
THE TRANSPORT	Nevel Dance Albrie	luo dian shi) 港粵網絡電視
新抱喜相逢	Queen Divas	(gang yue wang luo dian shi)
	4,55%,5%,65	港粤網絡電視
		(gang yue wang
苗屎媽媽	Coffee Cat Mama	luo dian shi)
SCANAL MINUS		港粤網絡電視
	Return of the Silver	(gang yue wang
5劍上的公堂	Tongue	luo dian shi)
		港粤網絡電視
三輪		(gang yue wang
	Brother's Keeper	luo dian shi)
		港粤網絡電視
70 700 Li		(gang yue wang
於們的天空	Shades of Life	luo dian shi)
		港粤網絡電視
s. Ft. L.		(gang yue wang
fy盛Lady	Bounty Lady	luo dian shi)

Call 36小時II	On The Hippocratic	港粤網絡電視 (gang yue wang
	Crusii ii	luo dian shi) 港粤網絡電視 (gang yue wang
法外風雲	Will Power	luo dian shi)
幸福摩天輪		港粤網絡電視 (gang yue wang luo dian shi)
耀舞長安		港粤網絡電視 (gang yue wang luo dian shi)
天梯		港粤網絡電視 (gang yue wang luo dian shi)
康政行動		港粤網絡電視 (gang yue wang luo dian shi)
心路GPS		港粵網絡電視 (gang yue wang luo dian shi)
熟男有惑		港粤網絡電視 (gang yue wang luo dian shi)
師父明白了		港粤網絡電視 (gang yue wang luo dian shi)
造王者		港粤網絡電視 (gang yue wang luo dian shi)
巴不得媽媽		港粤網絡電視 (gang yue wang luo dian shi)
訂上雲客2		港等網絡電視 (gang yue wang luo dian shi)
申探哥倫布		港粤網絡電視 (gang yue wang luo dian shi)
車鎗追 學		港粤網絡電視 (gang yue wang luo dian shi)
☆技慾孽Ⅱ		港多網絡電視 (gang yue wang uo dian shi)

圓月彎刀	Against the Blade of Honour	f 港台武俠 (gang ta wu xia)
天子尋龍	Whatever It Takes	港台武俠 (gang ta wu xia)
天機算	A Change of Destiny	港台武俠 (gang ta wu xia)
太極	The Master of Tai Chi	港台武俠 (gang tai wu xia)
精武門	Fist of Fury	港台武俠 (gang tai wu xia)
洗冤录	Witness to a Prosecution	港台武俠 (gang tai wu xia)
碧血盐枭	Sweetness in the Salt	港台武俠 (gang tai wu xia)
封神榜	Gods of Honour	港台武俠 (gang tai wu xia)
幕后大老爷	Man In Charge	港台武俠 (gang tai wu xia)
倚天屠龍記	Heaven Sword and Dragon Sabre	港台武俠 (gang tai wu xia)
尋秦記	A Step into the Past	港台武俠 (gang tai wu xia)
新方世玉	Heroes Of The Times	港台武俠 (gang tai wu xia)
天龍八部	The Demi-Gods and Semi-Devils	港台武俠 (gang tai wu xia)
神雕侠侣	The Condor Heroes	港台武俠 (gang tai wu xia)
射雕英雄傳	The Legend of the Condor Heroes	港台武俠 (gang tai wu xia)
少年四大名捕	The Four	港台武俠 (gang tai wu xia)
女拳	Grace Under Fire	港台武俠 (gang tai wu xia)
鹿鼎記	The Deer and the Cauldron	港台武俠 (gang tai wu xia)
聖元甲	Fearless	港台武俠 (gang tai wu xia)
大唐雙龍傳	Twin of Brothers	港台武俠 (gang tai wu xia)

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 75 of 95 Page ID #:1801

From: Kuelling, Chris.Kuelling@dish.com>
Sent: Wednesday, January 14, 2015 5:40 PM

To: 'Soyeun@SoyeunEsq.com'; 'clubtvpad.com@domainsbyproxy.com'

Subject: Club TVpad

Attachments: Club TVpad (1.13.15 letter).pdf

Dear Soyeun Choi,

Thank you for your letter dated December 17, 2014. Please be advised that we inadvertently referred to Club TVpad as Asha Media at various points in our cease and desist letter of November 20, 2014. Please see the attached corrected version of that letter.

Regards, Chris

Chris Kuelling

SVP, International Business and Legal Affairs DISH Network L.L.C. 9601 S. Meridian Boulevard Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444
Mobile: (720) 878-6951
Fax: (303) 723-2062
Email: chris.kuelling@dish.com



DISH Network L.L.C. P.O. Box 6663, Englewood, CO 80155-6663 303.723-1000

January 13, 2015

Via Email

Club TVpad, Inc. 3240 Shawn Way Hayward, California 94541

Email: Soyeun@SoyeunEsq.com; clubtvpad.com@domainsbyproxy.com

Re: <u>Infringement of Programming</u>

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that Club TVpad is currently selling a set-top device known as the "TVpad" that enables customers to view pirated television broadcasts (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. We also understand that Club TVpad promotes the availability of TVB and CCTV programming through the TVpad device. It is our further understanding that neither Club TVpad nor any other party makes any payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized Club TVpad or any other party to make content available through the TVpad. The unauthorized

reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law, as does the advertising and promotion of the availability of—and the encouragement of consumers to access—such infringing content.

It is our understanding that pirated CCTV and TVB content on the TVpad device is made available to your customers without authorization through an "app store," by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that the parties responsible for acquiring, reproducing, and transmitting pirated CCTV and TVB content on the device, as well as customers who purchase and use the TVpad device, may directly infringe the copyrights in television programming for which DISH, CCTV and/or TVB owns exclusive rights. Club TVpad is therefore liable for secondary copyright infringement because of its involvement in the sale and distribution of TVpad devices, its inducement of customers to infringe CCTV and TVB programming, and its material contribution to the infringing activities of others. Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided through those applications. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means whether live, time-delayed, or on-demand—is infringing.

We demand that Club TVpad immediately: (a) cease and desist selling TVpad devices that offer the applications listed in Exhibit A, or any similar infringing applications, through the TVpad app store; (b) cease and desist providing the applications listed in Exhibit A, and any similar applications; and (c) cease and desist marketing and promoting the availability of CCTV and TVB content on the TVpad, and encouraging consumers to access such content through the TVpad. Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH's, CCTV's or TVB's rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely.

Chris Kuelling

Senior Vice President, International Business & Legal Affairs

DISH Network L.L.C.

Exhibit A

TVpad "Live" Apps

TVpad App and icon	CCTV channels	TVB channels
BETV_HD3	CCTV 1 HD (live)	
BETV II 3 BETV 3 BETV3	CCTV 1 (live & replay live), CCTV 2 (live), CCTV 3 (live & replay live), CCTV 4 (live & replay live), CCTV 5 (live & replay live), CCTV 5+ (live), CCTV 6 (live & replay live), CCTV 10 (live), CCTV 11 (live), CCTV 12 (live), CCTV13 (live & replay live), CCTV14 (live & replay live), CCTV14 (live & replay live), CCTVIA EXX (CCTV fengyun soccer) (live) CCTV 1, CCTV 2, CCTV 3, CCTV 4, CCTV 5+, CCTV 6, CCTV 10, CCTV 11, CCTV 11, CCTV 12, CCTV 14, CCTVI3, CCTV 14	
粤海時移3 (Yue Hai Shi Yi 3)	fengyun soccer) (all live)	JADE HD, JADE (both time- shifted by 12 hours)
粤海寬頻3 (Yue Hai Kuan Pin 3)		JADE HD, JADE HD, J2, JADE, PEARL, interactive News (all live)
粤海寬頻23 (Yue Hai Kuan Pin 23)		JADE HD, JADE, J2, PEARL, interactive News, JADE HD (live and replay live)

516TV		TVBS (live)
516網路電視3 (516 Online TV 3) 516網路電視3	CCTV4 (live)	TVBS (live)
HITV		JADE HD, J2, JADE, Pearl, interactive News (live)
港粤網絡電視 (Gang Yue Wang Luo Dian Shi)		JADE HD, JADE, interactive News, J2, Pearl (live and replay live)
粤海直播 (Yue Hai Zhi Bo)		Interactive News, J2, Pearl, JADE, JADE HD (live)
体育online3 (Sport online3) sports 体育online3	CCTV 1, CCTV 5, CCTV 5+, CCTV风云足球 (CCTV fengyun soccer) (all live)	

TVpad On Demand Apps

The following app plays CCTV programming:

华数TV (WASU TV)

The following apps play TVB programming:

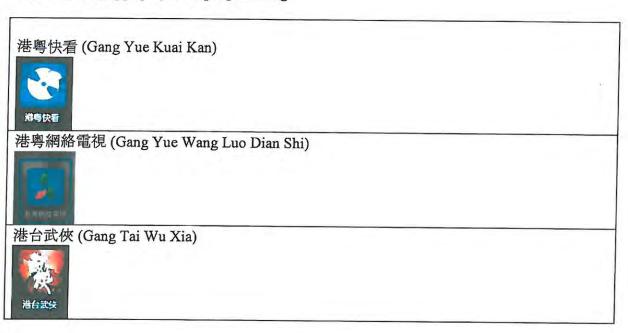


EXHIBIT B

Representative Examples of Programs

CCTV Program Name	Original Broadcast Date	Channel	Application
Across the Straight 海峡两岸	9/22/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/23/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/24/14	CCTV-4	BETVI
Across the Straight 海峡两岸	9/25/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/27/14	CCTV-4	516
Across the Straight 海峡两岸	9/28/14	CCTV-4	516
Across the Straight 海峡两岸	10/4/14	CCTV-4	516
Across the Straight 海峡两岸	10/5/14	CCTV-4	516
Around China 走遍中国	9/22/14	CCTV-4	BETVII3
Around China 走遍中国	9/23/14	CCTV-4	BETVII3
Around China 走遍中国	9/24/14	CCTV-4	BETV
Around China 走遍中国	9/25/14	CCTV-4	BETVII3
Around China 走遍中国	9/27/14	CCTV-4	516
Around China 走遍中国	9/28/14	CCTV-4	516
Around China 走遍中国	10/4/14	CCTV-4	516
Around China 走遍中国	10/5/14	CCTV-4	516
Art Life 艺术人生	9/25/14	CCTV-3	BETVII3
Art Life 艺术人生	10/3/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	9/26/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	10/3/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	10/5/14	CCTV-3	BETVII3
Fashion Infinite 流行无限	9/28/14	CCTV-4	516
Fashion Infinite 流行无限	10/5/14	CCTV-4	BETVII3
I want to go to the Spring Festival gala 我要上春晚	9/28/14	CCTV-3	BETVII3
I want to go to the Spring Festival gala 我要上春晚	10/5/14	CCTV-3	BETVII3
Star Walk 星光大道	9/25/14	CCTV-3	BETVII3
Star Walk 星光大道	10/3/14		BETVII3
Star Walk 星光大道	10/4/14	CCTV-3	BETVII3

To A Happy Departure 向幸福出发	9/22/14	CCTV-3	BETVII3
Variety Festival 综艺盛典	9/23/14	CCTV-3	BETVII3

TVB Program Name	Original Broadcast Date	Channel	Application
Pearl News 七點半新聞報導	9/29/14	Pearl	15
Come Home Love 愛回家	9/29/14	Jade	15
All That is Bitter is Sweet 大藥坊	9/29/14	Jade	15
Line Walker 使徒行者	9/29/14	JadeHD	14
Big Boy's Club 兄弟幫	9/29/14	J2	14
Pleasure & Leisure 都市閒情	9/30/14	Jade	15
Pearl News 七點半新聞報導	9/30/14	Pearl	15
Come Home Love 愛回家	9/30/14	Jade	14
All That is Bitter is Sweet 大藥坊	9/30/14	Jade	15
Line Walker 使徒行者	9/30/14	Jade	15
Big Boy's Club 兄弟幫	9/30/14	J2	15
Pleasure & Leisure 都市閒情	10/1/14	Jade	15
Pearl News 七點半新聞報導	10/1/14	Pearl	15
All That is Bitter is Sweet 大藥坊	10/1/14	Jade	HITV
Line Walker 使徒行者	10/1/14	Jade	HITV
Big Boy's Club 兄弟幫	10/1/14	J2	15
Pleasure & Leisure 都市閒情	10/2/14	Jade	15
Come Home Love 愛回家	10/2/14	Jade	15
All That is Bitter is Sweet 大藥坊	10/2/14	Jade	14
Big Boy's Club 兄弟幫	10/2/14	J2	15
Come Home Love 愛回家	10/3/14	Jade HD	15
Line Walker 使徒行者***	10/3/14	Jade	HITV
Line Walker 使徒行者***	10/3/14	Jade	15
Big Boy's Club 兄弟幫	10/3/14	J2	15

A Closer Look 時事多面睇	10/6/14	inews	18
Big Boy's Club 兄弟幫	10/7/14	J2	HITV
Come Home Love 愛回家	10/8/14	Jade	15
Pleasure & Leisure 都市閒情	10/8/14	Jade	17
Big Boy's Club 兄弟幫	10/8/14	J2	15
Pleasure & Leisure 都市閒情	10/9/14	Jade	17
Pearl News 七點半新聞報導	10/9/14	Pearl	15

Additional TVB Programs available on-demand

TVB Program Chinese Name	TVB Program English name	VOD App.
Table Control	Ghost Dragon of	港粤快看 (gang
寒山潛龍	Cold Mountain	yue kuai kan)
忠奸人	Black Heart White Soul	港粤快看 (gang yue kuai kan)
愛. 回家	Come Home Love	港粤快看 (gang yue kuai kan)
點金勝手	The Ultimate Addiction	港粤快看 (gang yue kuai kan)
我們的天空		港粤快看 (gang yue kuai kan)
食為奴	Gilded Chopsticks	港粤快看 (gang yue kuai kan)
守業者	Storm in a Cocoon	港粤快看 (gang yue kuai kan)
單戀雙城	Outbound Love	港粤快看 (gang yue kuai kan)
叛逃	Ruse of Engagement	港粤快看 (gang yue kuai kan)
女人俱樂部	Never Dance Alone	港粤快看 (gang yue kuai kan)
新抱喜相逢	Queen Divas	港粤快看 (gang yue kuai kan)
貓屎媽媽	Coffee Cat Mama	港粤快看 (gang yue kuai kan)
舌劍上的公堂	Return of the Silver Tongue	港粤快看 (gang yue kuai kan)
巨輪	Brother's Keeper	港粤快看 (gang yue kuai kan)
我們的天空	Shades of Life	港粤快看 (gang

		yue kuai kan)
	G. T. W. U. P.	港粤快看 (gang
My盛Lady	Bounty Lady	yue kuai kan)
To the second second	On The Hippocratic	港粤快看 (gang
Call 36小時II	Crush II	yue kuai kan)
area de la companya d		港粤快看 (gang
法外風雲	Will Power	yue kuai kan)
X12-13-12-73-13-13-13-13-13-13-13-13-13-13-13-13-13		港粤快看 (gang
東張西望 20140804		yue kuai kan)
1.121 a. 122 decree a se		港粤快看 (gang
東張西望 20140805		yue kuai kan)
2.7.7.2		港粤快看 (gang
燭光晚餐		yue kuai kan)
		港粤快看 (gang
沒女大翻身		yue kuai kan)
		港粤快看 (gang
食平DD		yue kuai kan)
Co. 313 A. Wallander		港粤快看 (gang
SUNDAY扮嘢王		yue kuai kan)
months and		港粤快看 (gang
街頭魔法王2		yue kuai kan)
A STATE OF A STATE OF		港粤快看 (gang
瘋狂夏水禮		yue kuai kan)
		港粤快看 (gang
夏,日,悠遊		yue kuai kan)
		港粤快看 (gang
2014FIFA巴西世界杯-黃金戰報		yue kuai kan)
		港粤快看 (gang
2014FIFA巴西世界杯-熱爆巴西		yue kuai kan)
A STANDARD		港粤快看 (gang
走過足球聖地	4	yue kuai kan)
		港粤快看 (gang
夬樂聯盟		yue kuai kan)
		港粤網絡電視
	Ghost Dragon of	(gang yue wang
寒山潛龍	Cold Mountain	luo dian shi)
		港粤網絡電視
h 4	Black Heart White	(gang yue wang
也奸人	Soul	luo dian shi)
		港粤網絡電視
	Lawrence Toronto	(gang yue wang
愛. 回家	Come Home Love	luo dian shi)
	The Title	港粤網絡電視
上会選工	The Ultimate	(gang yue wang
占金勝手	Addiction	luo dian shi)

		港粤網絡電視
 搵個好男人		(gang yue wang luo dian shi)
		港粤網絡電視
		(gang yue wang
燭光晚餐		luo dian shi)
		港粤網絡電視
2.1.5.11.2.		(gang yue wang
年代大激鬥		luo dian shi)
		港粵網絡電視
A =		(gang yue wang
食平DD		luo dian shi)
		港粤網絡電視
A 44 4m		(gang yue wang
食為奴	Gilded Chopsticks	luo dian shi)
		港粤網絡電視
☆ ₩ ₩	2.5	(gang yue wang
守業者	Storm in a Cocoon	luo dian shi)
		港粤網絡電視
89 494 ## L-D	100000000000000000000000000000000000000	(gang yue wang
單戀雙城	Outbound Love	luo dian shi)
		港粤網絡電視
ine wh	120002	(gang yue wang
叛逃	Ruse of Engagement	luo dian shi)
		港粤網絡電視
↓ 1 /目 ⟨較 ☆7	The second second	(gang yue wang
女人俱樂部	Never Dance Alone	luo dian shi)
		港粤網絡電視
新抱喜相逢	2 2 2	(gang yue wang
所招告怕连	Queen Divas	luo dian shi)
		港粤網絡電視
描屎媽媽	Coffee Cat Many	(gang yue wang
田木物物	Coffee Cat Mama	luo dian shi)
	Return of the Silver	港粤網絡電視
舌劍上的公堂	physical control and the	(gang yue wang
그께그비스포	Tongue	luo dian shi)
三 転合		港粤網絡電視
巨輪	Brother's Keeper	(gang yue wang
	brother's keeper	luo dian shi)
		港粤網絡電視
戏們的天空	Shades of Life	(gang yue wang
AII JHソハエ	Silades of Life	luo dian shi)
		港粤網絡電視
/v戍ladv	Rounty Lady	(gang yue wang
My盛Lady	Bounty Lady	luo dian shi)

On The Hippogratic	港粤網絡電視
Crush II	(gang yue wang luo dian shi)
	港粤網絡電視
	(gang yue wang
Will Power	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
W .	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang
	luo dian shi)
	港粤網絡電視
	(gang yue wang luo dian shi)

圓月彎刀	Against the Blade of Honour	港台武俠 (gang tai wu xia)
天子尋龍	Whatever It Takes	港台武俠 (gang tai wu xia)
天機算	A Change of Destiny	港台武俠 (gang tai wu xia)
太極	The Master of Tai Chi	港台武俠 (gang tai wu xia)
精武門	Fist of Fury	港台武俠 (gang tai wu xia)
洗冤录	Witness to a Prosecution	港台武俠 (gang tai wu xia)
碧血盐枭	Sweetness in the Salt	港台武俠 (gang tai wu xia)
封神榜	Gods of Honour	港台武俠 (gang tai wu xia)
幕后大老爷	Man In Charge	港台武俠 (gang tai wu xia)
倚天屠龍記	Heaven Sword and Dragon Sabre	港台武俠 (gang tai wu xia)
尋秦記	A Step into the Past	港台武俠 (gang tai wu xia)
新方世玉	Heroes Of The Times	港台武俠 (gang tai wu xia)
天龍八部	The Demi-Gods and Semi-Devils	港台武俠 (gang tai wu xia)
神雕侠侣	The Condor Heroes	港台武俠 (gang tai wu xia)
射雕英雄傳	The Legend of the Condor Heroes	港台武俠 (gang tai wu xia)
少年四大名捕	The Four	港台武俠 (gang tai wu xia)
女拳	Grace Under Fire	港台武俠 (gang tai wu xia)
鹿鼎記	The Deer and the Cauldron	港台武俠 (gang tai wu xia)
聖元甲	Fearless	港台武俠 (gang tai wu xia)
大唐雙龍傳	Twin of Brothers	港台武俠 (gang tai wu xia)

Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 89 of 95 Page ID

#:1815



Investment

TVpad News



Best Streaming Player for Overseas Chinese

Over millions of TVpad have been sold Over ten millions of loyal users worldwide

From TVpad1 to TVpad4, we make better TVpad Fast increased sales Stably enlarged market share Top-selling streaming player for overseas Chinese



TVpad products have been rated as the best streaming player for overseas Chinese. As the latest generation of TVpad products, TVpad4 achieved more powerful functions, providing you with HD, stable and smooth Chinese video contents.

High-Definition Displays

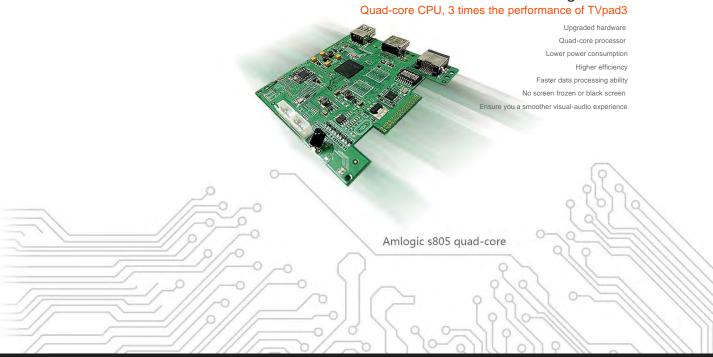
No matter live TV programs or videos on demand, you are free to experience unbelievable detail.

H.265 high efficiency video coding 1080p full HD video transmission Lower bandwidth requirement

EXHIBIT 104



Smoother Than Your Imagination



More Stable Than Ever

500 technicians, 5-year technologies accumulation, well-established emergency response mechanism, 24/7 customer service and all-new



Bigger on Contents

Tens of new content providers just joined!

TVpad4 has introduced and cooperated with thousands of 3rd party content providers, providing massive apps for your choice.

Massive live & VOD contents from China/HK/Taiwan bring whatever you want.

12-hour time shifting & 72-hour playback are available and you won't miss anything.





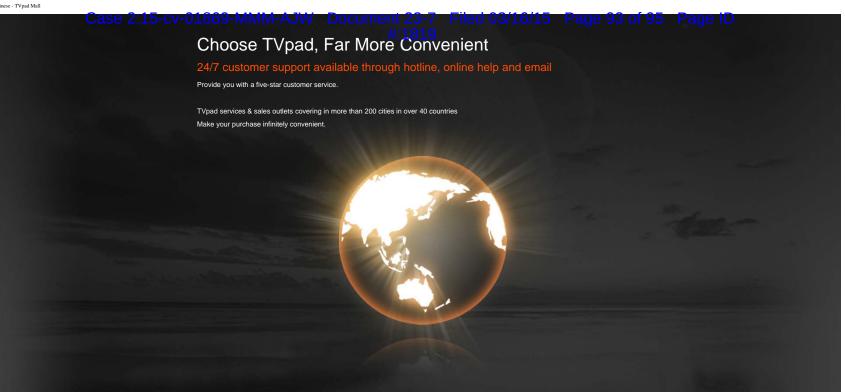
Simple Operation, So Easy!

Say NO to firewall and IP restriction, just 2 steps to get started TVpad4!

Simplified and user-friendly operations make things easier for each of your family member.

Fast response and smooth interactive experience make the operation freely.





4 EASY STEPS TO SET UP TVpad4



Case 2:15-cv-01869-MMM-AJW Document 23-7 Filed 03/16/15 Page 94 of 95 Page ID #:1820

New Apps



Specifications

Basic	Device Name	TVpad4
	Model	M418
Specifications	Network	Bandwidth≥2M
	L*W*H	TVpad device: 100*100*21mm Package: 149*149*82mm
	Weight	N.W.: 135g; G.W.: 620g
	CPU	Amlogic s805 quad-core
	CPU Frequency	1.4G
	FLASH (built-in memory)	4G
	RAM	1G
	Power	Working power 5W; Standby power 0.5W
	Video Output	HDMI/AV
Ports & Interfaces	USB Port	USB2.0 port ×1
	Memory Card	TF card slot x1
	Ethernet Port	Ethernet portx1/Built-in Wi-Fi
Software	Power Port	Input: DC5V, 2A
	System Language	Multi-language (简 体中 文/繁體中文/English/日本語/한국어)
	Video Decorder	MPEG1/2/4, H.263, Xvid, WMV9, H.264, VC-1, H.265, etc.

TVpad - The Best Streaming Player for Overseas Chinese - TVpad Mall

Case 2:15-cv-01869-MMM-AJW--Document 23-7---Filed 03/16/15- Page 95 of 95 Page ID

Audio Decorder #: 1/82/1/a, OGG, WAV, AAC, PCM, AC3, M4A, etc.

Certification Certified by CE,C-TICK,FCC,IC RoHS HDMI

Payment

Credit Card

Western Union

Security

Help Center Shopping Guide My Order

App Publishing

FAQ

Shipping
Shipping Range
Logistics
About Tariffs
About Receipt

After-sale Service
Commitment
App Installation
About Return
Check Warranty

About Us
Company Profile
Statement
Contact Us
Media Support

Contact Us

(00852)2134-9910
24 hours customer service
Global Service Center

Copyright © 2007-2015 啟創科技 香港 有限公司 CREATE NEW TECHNOLOGY (HK) LIMITED All Rights Reserved